



## **AMERICAN ANGUS ASSOCIATION**

**The Business Breed**

March 26, 2003

Chief, Standardization Branch  
AMS, Livestock and Seed Program  
USDA Stop 0254  
1400 Independence Ave., SW  
Washington, D.C. 20250-0254

RE: Marketing Claims Standards for Livestock and Meat, Docket No. LS-02-02

Thank you for the opportunity to submit our recommendations in response to the USDA request for comments published in the December 30, 2002, Federal Register, pages 79552 through 79556. We applaud this USDA initiative as it should result in greater clarity as well as more consistency and accuracy in the various marketing claims. The comments that follow center on Angus breed claims: who determines the breed criteria and what the breed criteria should be.

### **1. Who determines Angus breed claims?**

Breed claims for all future USDA certified programs that use the Angus name should be established by the American Angus Association.

The American Angus Association, in cooperation with USDA-AMS, created in 1978 the first USDA certified beef program, known as the *Certified Angus Beef*<sup>®</sup> Program. To this date, the American Angus Association is the only Angus Association in the U.S. that has established and maintained a branded beef program to further the Angus breed. High carcass quality standards were set by the Association to promote and perpetuate the genetic ability of purebred and black Angus-influenced crossbred cattle to produce highly marbled beef products. Those standards have not changed in the 25-year history of the Program.

The *Certified Angus Beef*<sup>®</sup> Program was the only USDA certified program for eight years and the only Angus USDA certified program until 1995. The landmark decision in 1978, to establish a high quality branded beef program, was made while the U.S. beef industry was undergoing major changes due to an influx of many new breeds, none of which were black-hided and all produced lower quality lean beef products. Since that time, many of the newly introduced breeds became black-hided, but very few, if any, possess the genetic capability to produce high quality beef carcasses on a consistent

basis. Superior Angus genetics have and will continue to differentiate black-hided cattle. Since 1995, the number of Angus USDA certified programs peaked at 35, and today the total is 23. All of these programs, except the CAB® Program, are packer or distributor-owned programs that span the complete spectrum of quality and maturity standards, including cull cows. This has created unacceptable confusion among consumers and within the retail and foodservice industries as to what quality standards Angus beef products represent.

Today, the American Angus Association, the world's largest breed registry, represents over 35,000 adult and junior members and forty percent of the total purebred registrations in the United States. The American Angus Association, representing its members, has the greatest interest in the marketing of the Angus name to the trade and the consumer. We have serious concerns about future USDA certified programs with low quality specifications, especially cow programs, carrying the Angus name. This stands to jeopardize both the trust consumers have established in high quality Angus brands over the last quarter century and the value built into Angus cattle over that time. For that reason, we fully support the proposed policy that would enable the respective breed associations to determine the specifications of future programs bearing their breed's name.

## **2. Breed Criteria**

The American Angus Association continues to endorse the quality standards represented by the *Certified Angus Beef*® brand. The Association also recognizes that some companies have had success with Angus programs that include cattle meeting slightly lower marbling specifications, which have helped add value to Angus and Angus-type cattle. It is therefore recommended that all future Angus USDA certified programs be required to comply with all USDA-AMS GLA (phenotype) specifications for live animal characteristics and the following minimum carcass specifications:

1. Small 50 marbling or higher
2. A maturity (lean and skeletal)
3. Medium or fine marbling texture
4. No blood splashing
5. Moderately thick or thicker muscling
6. Hump height not to exceed two inches
7. No dark cutters
8. No yield grade requirement

We believe these specifications allow each Angus or Angus-type beef animal to be considered for a future Angus USDA certified program. But, the animal will need to have the genetics (plus good management) to produce a carcass with higher quality characteristics the American Angus Association wants representing the Angus breed.

## **3. What about the current Angus certified programs?**

We recommend all currently existing Angus USDA certified programs be allowed to

continue until their owner/sponsor decides they are no longer feasible to maintain. Consumers will cast their votes at the cash registers and determine how many of the present 23 Angus programs will survive in the future. But for the future, it is essential that Angus USDA certified programs meet the criteria listed above so we can eliminate, as much as possible, the confusion with consumers and the trade about the quality standards Angus beef products represent.

Since the inception of the USDA certification process, the industry has been well served through the aid consumers receive in identifying premium beef products with inherent quality attributes. It would be highly unfortunate to allow the value of the USDA certification process, as well as the value in the Angus name, to erode in the minds of consumers, in part due to future low quality certified brands structured more around marketing and confusion versus consumer satisfaction.

Thank you for the opportunity to provide these recommendations regarding breed claims for USDA certified programs.

Sincerely,



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